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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
	)	CC Docket No. 92-237
	)	
Administration of the	)	
North American Numbering Plan	)	
Carrier Identification Codes (CICs)	)	

**REPLY COMMENTS**

Americatel Corporation, through its attorneys, hereby submits these reply comments in response to the submissions of several other parties in the above-captioned proceedings. Americatel's Comments, filed March 6, demonstrated that Carrier Identification Codes (CICs) are an important tool for supporting the Commission's goal of developing a competitive long distance market in the United States, because they permit dial-around access as an alternative to presubscription. There is a growing international recognition, not only in the countries mentioned in Americatel's Comments but also in several European countries, that access codes provide an effective means of promoting competition and enhancing consumer choice, thereby serving the public interest. As a result, Americatel believes that when making decisions about the assignment, use and management of CICs, the Commission should carefully consider the potential impact on this burgeoning market. The comments of the other parties to this proceeding fail to recognize the importance of this use of CICs for promoting competition.

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## 1. Carrier Identification Codes Have Commercial Value

MCI's Reply Comments at 9-10 stated that, unlike toll free numbers, CICs are not commercial commodities and have little or no independent commercial value to telecommunications carriers. This statement is clearly wrong with respect to the dial-around long distance market. In the dial-around market, CICs have a uniqueness that has commercial value. To offer but a few examples, Vartec and MCI have advertised their access codes extensively; AT&T was assigned the CIC 288 which spells ATT; and Americatel believes that its own CIC, 123, has commercial value because it is easy to remember. Thus, those CICs that are used consciously by consumers when completing calls are similar to toll free numbers and have commercial value. Furthermore, Americatel's market research demonstrates that a significant percentage of consumers are already discouraged from trying dial-around long distance service due to the length of the access code (10XXX) which must be dialed. (Excerpts from the Hispanic Telephone Study prepared for Americatel by Hispanic Market Connections, Inc. are attached.) Therefore, proposed changes to CICs and/or to related dialing patterns should carefully consider the impact on consumers of such changes.

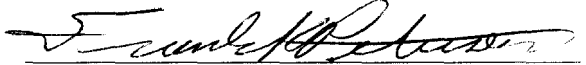
## 2. Numbering Policies Should Serve the Marketplace

Some parties take the view that no limits should be placed on either the number of CICs assigned to an entity or on the uses made of the CICs. Americatel believes that its proposal on limiting the CIC assignment, and use of shorter CICs strictly for access to long distance carriers

and for traffic routing and billing purposes best serves the Commission's stated goal "to establish a plan for the distribution and management of CICs that minimizes the frequency of CIC expansion while promoting competition to the greatest extent possible." (Further Notice of Proposed Rulemaking and Order, ¶ 11) It would permit new services in the marketplace (using alternative technologies or longer CICs) while at the same time preserving the viability of the dial-around industry as a competitive alternative to presubscription (by maintaining a dialing pattern that is simple, attractive and easy-to-use by consumers). The process of blanket conversions of CICs and large scale changes in numbering plans are complicated, expensive and disruptive to carriers and consumers. Americatel strongly supports a competitive marketplace and it is for that very reason that Americatel believes that the Commission should not allow the indiscriminate assignment of CICs that has the, perhaps unintended, consequence of undermining the success of an important segment of the long distance market, the dial-around industry. As it is, Americatel continues to believe that enough issues remain open that the elimination of three digit CICs should be delayed until the issues are resolved.

Respectfully submitted,


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April 3, 1998

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Reply Comments of Americatel Corporation were hand delivered on this 3rd day of April 1998 to the following parties.

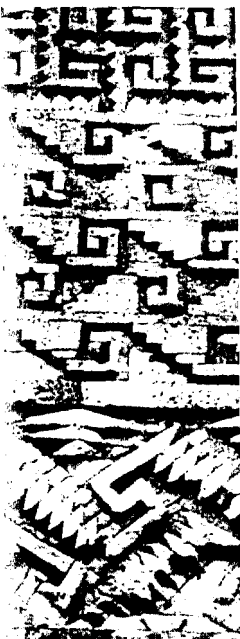


Frank K. Peterson

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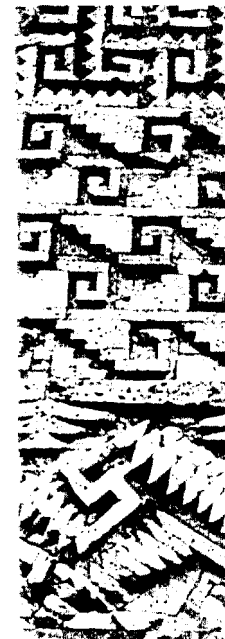
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# HISPANIC MARKET

CONNECTIONS, INC.

Bilingual/Bicultural Market Research



*Americatel*

## HISPANIC TELEPHONE STUDY Banner I

March 1997

Prepared for:  
*Americatel*

Prepared by:  
Hispanic MARKET CONNECTIONS, INC.



TABLE 241

Concept 2 w/o Don Francisco: Not Aware of Don Francisco

35E. What part of the concept makes you say you not very/not at all willing to dial?

Base: Very/Somewhat willing to dial

			GENDER		INCOME			LONG DIST CARRIER			AVE # CALLS IN US			AVE # INT'L CALLS				
	TOTAL WGHTD	TOTAL UNWGHTD	MALE	FEMALE	<\$20K	\$20- \$39.9K	\$40K+	AT&T	MCI	SPRINT	NONE	(1-3) LIGHT	(4-10) MEDIUM	(11+) HEAVY	NONE	(1-3) LIGHT	(4-10) MEDIUM	(11+) HEAVY
TOTAL	85 100.0 %	88 100.0 %	34 100.0 % (C)	52 100.0 % (D)	10 100.0 % (E)	6 100.0 % (F)	38 100.0 % (G)	55 100.0 % (H)	5 100.0 % (I)	5 100.0 % (J)	20 100.0 % (K)	12 100.0 % (L)	26 100.0 % (M)	26 100.0 % (N)	68 100.0 % (O)	7 100.0 % (P)	5 100.0 % (Q)	6 100.0 % (R)
No Answer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Any Response	85 100.0	88 100.0	34 100.0	52 100.0	10 100.0	6 100.0	38 100.0	55 100.0	5 100.0	5 100.0	20 100.0	12 100.0	26 100.0	26 100.0	68 100.0	7 100.0	5 100.0	6 100.0
5-digit access code	27 31.6	32 36.4	13 38.7	14 26.9	1 6.2	3 45.5	14 37.4	21 39.0	1 25.3	2 32.2	5 23.9	6 44.5	8 28.6	9 34.4	22 31.9	1 15.0	1 25.3	3 52.3
No need to switch carriers	19 21.7	15 17.0	9 26.9	10 18.4	6G 60.7	1 19.8	4 10.4	8 15.3	-	3 58.2	6 30.9	1 4.0	3 13.2	8 31.6	14 20.7	2 23.6	1 11.9	2 38.7
It has experience/I am happy with the company	14 16.8	13 14.8	5 13.7	10 18.8	2 16.3	1 8.6	7 19.3	10 18.8	2 51.2	-	2 11.7	3 26.0	8 29.1	1 4.0	14 21.2	-	-	-
Prefers English/Doesn't speak Spanish	5 5.9	4 4.5	1 1.6	4 8.7	-	-	4 11.7	3 4.8	-	-	-	-	3 13.1	2 6.1	3 4.3	2 22.6	-	1 9.0
Lack of information/Unsure of the cost/Needs to know more	5 5.9	4 4.5	1 1.6	4 8.7	-	-	5 11.8	1 0.9	1 11.7	-	1 2.6	-	2 8.1	2 9.0	3 5.1	2 22.6	-	-
Available to anyone	4 4.5	7 8.0	3 8.2	1 2.1	1 11.5	1 17.5	1 1.4	2 4.0	1 11.9	-	1 5.9	1 4.4	1 4.1	1 3.9	4 5.7	-	-	-
Doesn't use the phone that much/ long distance/doesn't live in country	2 1.8	3 3.4	1 1.5	1 2.1	1 5.3	1 8.6	-	1 1.9	-	-	1 5.3	-	1 1.9	-	2 2.3	-	-	-
Competitive Prices	1 0.8	1 1.1	-	1 1.3	-	-	-	-	-	-	1 3.2	-	-	-	-	1 9.2	-	-
I don't like the changes/Too busy/ Doesn't need	1 0.6	1 1.1	-	1 1.0	-	-	-	1 1.0	-	-	-	1 4.3	-	-	-	-	1 11.7	-
Available anytime	1 0.6	1 1.1	-	1 1.0	-	-	-	1 0.9	-	-	1 2.5	-	-	-	1 0.7	-	-	-
Don Francisco is an owner	1 0.6	1 1.1	1 1.5	-	-	-	1 1.3	-	-	-	1 2.5	-	-	-	1 0.7	-	-	-
It is complicated/It is not useful	1 0.6	1 1.1	-	1 1.0	-	-	1 1.3	-	-	1 9.6	-	-	-	1 1.9	1 0.7	-	-	-

Hispanic MARKET CONNECTIONS, Inc. - Entel Telephone Service Hispanic Study - January 1997

TABLE 241 (continued)

Concept 2 w/o Don Francisco: Not Aware of Don Francisco

35E. What part of the concept makes you say you not very/not at all willing to dial?

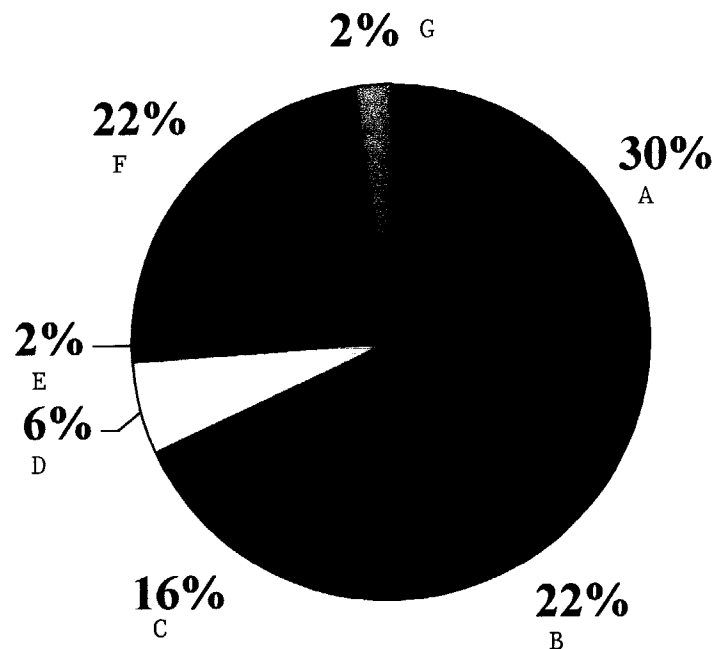
Base: Very/Somewhat willing to dial

	TOTAL WGHTD	TOTAL UNWGHTD	GENDER		INCOME			LONG DIST CARRIER			AVE # CALLS IN US			AVE # INT'L CALLS				
			MALE	FEMALE	<\$20K	\$20- \$39.9K	\$40K+	AT&T	MCI	SPRINT	NONE	(1-3) LIGHT	(4-10) MEDIUM	(11+) HEAVY	NONE	(1-3) LIGHT	(4-10) MEDIUM	(11+) HEAVY
Other	4 5.2	3 3.4	2 6.2	2 4.6	-	-	2 4.2	4 8.1	-	-	-	2 12.8	1 1.9	2 9.0	2 2.4	1 7.1	20 51.2	-
Don't know/Refused	2 2.8	1 1.1	-	2 4.6	-	-	-	2 4.3	-	-	2 11.7	-	-	-	2 3.5	-	-	-
None	1 0.6	1 1.1	-	1 1.0	-	-	1 1.3	1 0.9	-	-	-	1 4.0	-	-	1 0.7	-	-	-

(sig=.05) (n\_k) columns tested CD, EFG, HIJ, KLMN, OPQR

Hispanic MARKET CONNECTIONS, Inc. - Entel Telephone Service Hispanic Study - January 1997

# What reasons would people not be willing to dial a 5-digit long distance access code



- A ■ 5 digit access code
- B ■ No need to switch carriers
- C ■ I'm happy with current company
- D □ Lack of information
- E ■ Don't use the phone as much
- F ■ Other
- G ■ Don't know

Source: Hispanic Market Connections, Inc., March 1997



Hispanic MARKET CONNECTIONS, Inc. - Entel Telephone Service Hispanic Study - January 1997

TABLE 059

10C. Have you ever used the services offered by this type of long distance company?

Base: Heard of saving access codes

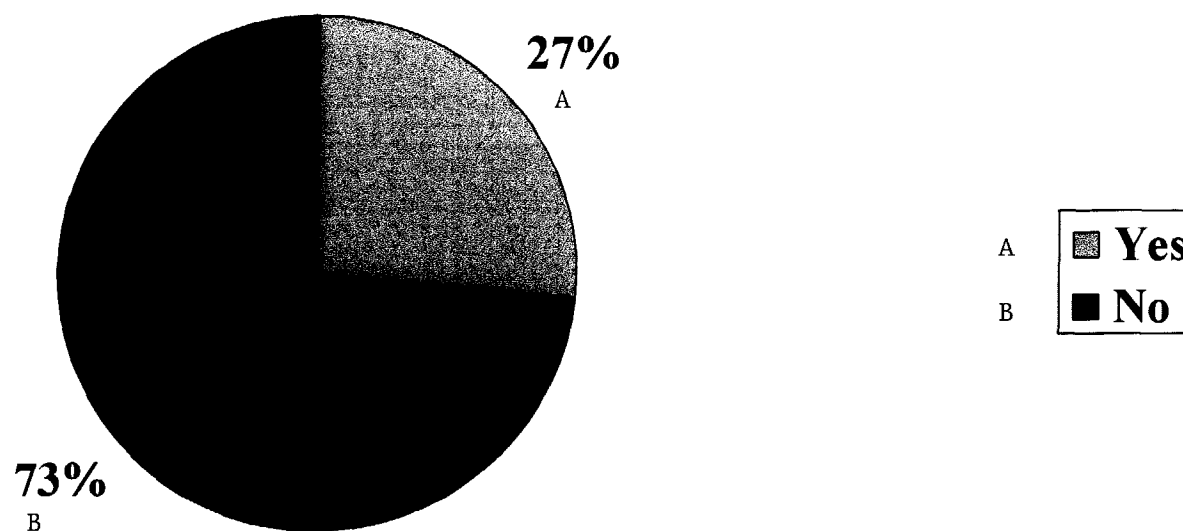
	MARKET (UNWEIGHTED)										WEIGHTED									
	<----->									LANGUAGE SEGMENTS				AGE				YEARS IN THE US		
	TOTAL WGHTD	TOTAL UNWGHTD	LA	NY	MIA	SF	CHI	SA	HOU	SPAN DOMT	SPAN PREF	BILING	ENGL PR/DM	18-29	30-39	40-54	55+	0-10	11-20	21+
			(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)	(T)
TOTAL	792 100.0 %	789 100.0 %	142 100.0 %	94 100.0 %	111 100.0 %	103 100.0 %	105 100.0 %	119 100.0 %	115 100.0 %	157 100.0 %	223 100.0 %	310 100.0 %	102 100.0 %	191 100.0 %	265 100.0 %	220 100.0 %	110 100.0 %	175 100.0 %	141 100.0 %	112 100.0 %
No Answer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Any Response	792 100.0	789 100.0	142 100.0	94 100.0	111 100.0	103 100.0	105 100.0	119 100.0	115 100.0	157 100.0	223 100.0	310 100.0	102 100.0	191 100.0	265 100.0	220 100.0	110 100.0	175 100.0	141 100.0	112 100.0
Yes	212 26.7	202 25.6	39 27.5	27 28.7	35 31.5	18 17.5	28 26.7	32 26.9	23 20.0	39 24.7	65 29.3	90 29.0	17 17.1	53 27.5	72 27.1	53 24.1	34 30.5	47 26.8	53 37.7	31 27.5
No	581 73.3	587 74.4	103 72.5	67 71.3	76 68.5	85 82.5	77 73.3	87 73.1	92 80.0	118 75.3	158 70.7	220 71.0	85 82.9	139 72.5	193 72.9	167 75.9	77 69.5	128 73.2	88 62.3	81 72.5

(sig=.05) (n\_k) columns tested CDEFG

JKLM, NOPQ, RST

Hispanic MARKET CONNECTIONS, Inc. - Entel Telephone Service Hispanic Study - January 1997

# Have you ever used the 5 digit access code



Source: Hispanic Market Connections, Inc., March 1997

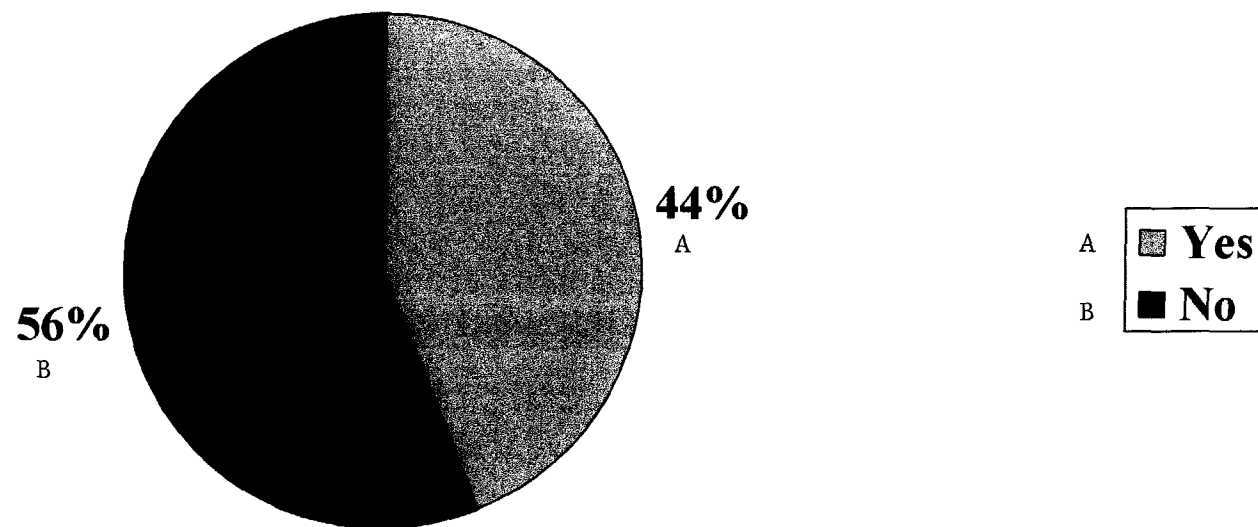
TABLE 058

10B. Have you heard of these types of long distance companies that offer these savings access codes?

	MARKET (UNWEIGHTED)										WEIGHTED									
	<=====									LANGUAGE SEGMENTS				AGE				YEARS IN THE US		
	TOTAL WGHTD	TOTAL UNWGHTD	LA	NY	MIA	SF	CHI	SA	HOU	SPAN DOMT	SPAN PREF	BILING	ENGL PR/DM	18-29	30-39	40-54	55+	0-10	11-20	21+
TOTAL	1801 100.0 %	1800 100.0 %	300 100.0 %	250 100.0 %	250 100.0 %	250 100.0 %	250 100.0 %	250 100.0 %	250 100.0 %	474 100.0 %	529 100.0 %	652 100.0 %	146 100.0 %	438 100.0 %	629 100.0 %	434 100.0 %	280 100.0 %	460 100.0 %	345 100.0 %	286 100.0 %
			(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)	(T)
No Answer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Any Response	1801 100.0	1800 100.0	300 100.0	250 100.0	250 100.0	250 100.0	250 100.0	250 100.0	250 100.0	474 100.0	529 100.0	652 100.0	146 100.0	438 100.0	629 100.0	434 100.0	280 100.0	460 100.0	345 100.0	286 100.0
Yes	792 44.0	789 43.8	142 47.3	94 37.6	111 44.4	103 41.2	105 42.0	119 47.6	115 46.0	157 33.2	223 42.1	310J 47.6	102JKL 69.7	191 43.7	265 42.1	220Q 50.6	110 39.4	175 38.0	141 40.8	112 39.1
No	1009 56.0	1011 56.2	158 52.7	156 62.4	139 55.6	147 58.8	145 58.0	131 52.4	135 54.0	317LM 66.8	306M 57.9	342M 52.4	44 30.3	246 56.3	364 57.9	214 49.4	170P 60.6	285 62.0	204 59.2	175 60.9

(sig=.05) (n\_k) columns tested CDEFGHI, JKLM, NOPQ, RST

# People who have heard of 5 digit long distance access codes



Source: Hispanic Market Connections, Inc, March 1997

Hispanic MARKET CONNECTIONS, Inc. - Entel Telephone Service Hispanic Study - January 1997

TABLE 060

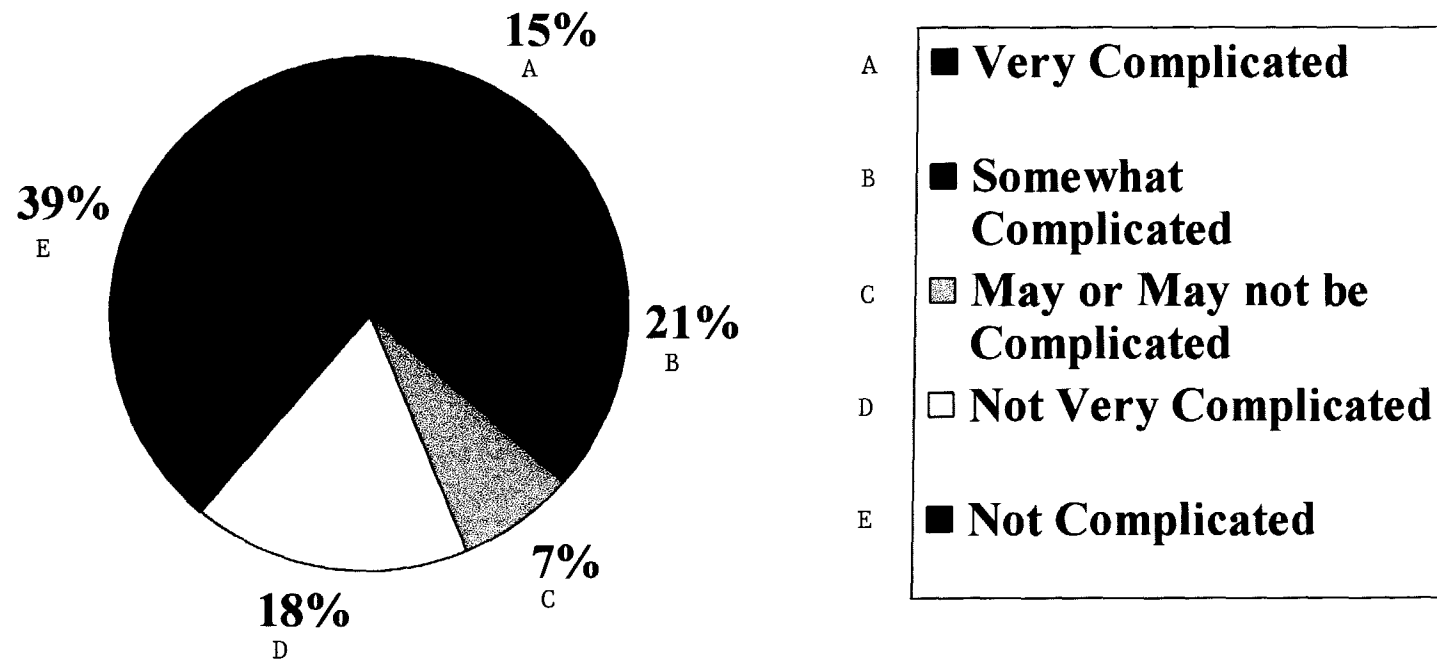
10D. When you think about having to dial the 5-digit access code in addition to the telephone number, would you say that doing so would be ... ?

											WEIGHTED										
	MARKET (UNWEIGHTED)										LANGUAGE SEGMENTS				AGE				YEARS IN THE US		
	TOTAL WGHTD	TOTAL UNWGHTD	LA	NY	MIA	SF	CHI	SA	HOU	SPAN DOMT	SPAN PREF	BILING	ENGL PR/DM	18-29	30-39	40-54	55+	0-10	11-20	21+	
TOTAL	1801 100.0 %	1800 100.0 %	300 100.0 %	250 100.0 %	250 100.0 %	250 100.0 %	250 100.0 %	250 100.0 %	250 100.0 %	474 100.0 %	529 100.0 %	652 100.0 %	146 100.0 %	438 100.0 %	629 100.0 %	434 100.0 %	280 100.0 %	460 100.0 %	345 100.0 %	286 100.0 %	
			(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)	(T)	
No Answer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Any Response	1801 100.0	1800 100.0	300 100.0	250 100.0	250 100.0	250 100.0	250 100.0	250 100.0	250 100.0	474 100.0	529 100.0	652 100.0	146 100.0	438 100.0	629 100.0	434 100.0	280 100.0	460 100.0	345 100.0	286 100.0	
(NET) Top 2 Box -----	635 35.3	634 35.2	108 36.0	85 34.0	85 34.0	82 32.8	101 40.4	84 33.6	89 35.6	158 33.3	211 39.8	216 33.1	51 34.9	133 30.3	235 37.3	158 36.5	107 38.1	165 35.9	124 35.9	115 40.3	
(5) Very Complicated/Difficult	267 14.8	269 14.9	43 14.3	38 15.2	44 17.6	34 13.6	35 14.0	40 16.0	35 14.0	77 16.3	81 15.3	85 13.0	24 16.4	43 9.9	101 16.0	67 15.5	53N 18.9	63 13.7	55 15.9	59 20.6	
(4) Somewhat Complicated/ Difficult	368 20.4	365 20.3	65 21.7	47 18.8	41 16.4	48 19.2	66 26.4	44 17.6	54 21.6	80 16.9	130 24.6	131 20.1	27 18.5	90 20.4	134 21.3	91 20.9	54 19.1	102 22.1	69 20.0	57 19.8	
(3) May or May Not Be Complicated/Difficult	123 6.8	109 6.1	26 8.7	14 5.6	20 8.0	19 7.6	9 3.6	9 3.6	12 4.8	40 8.3	31 5.8	39 6.0	13 9.2	38 8.6	40 6.4	29 6.7	13 4.7	32 6.9	17 5.0	15 5.3	
(2) Not Very Complicated/ Difficult	308 17.1	311 17.3	55 18.3	35 14.0	42 16.8	43 17.2	36 14.4	53 21.2	47 18.8	76 16.1	97 18.4	110 16.9	24 16.3	83 18.9	84 13.4	86 19.8	51 18.1	89 19.3	51 14.8	53 18.3	
(1) Not Complicated/Difficult At All	675 37.5	684 38.0	105 35.0	102 40.8	94 37.6	101 40.4	96 38.4	89 35.6	97 38.8	184 38.8	178 33.6	261 40.1	53 35.9	171 39.0	252 40.1	149 34.3	93 33.2	168 36.6	139 40.4	86 30.0	
(NET) Bottom 2 Box -----	983 54.6	995 55.3	160 53.3	137 54.8	136 54.4	144 57.6	132 52.8	142 56.8	144 57.6	260 55.0	275 51.9	372 57.0	76 52.2	254 58.0	336 53.5	234 54.1	144 51.3	257 55.8	190 55.2	139 48.4	
Don't know	60 3.3	62 3.4	6 2.0	14 5.6	9 3.6	5 2.0	8 3.2	15 6.0	5 2.0	16 3.4	13 2.4	25 3.8	5 3.7	14 3.1	17 2.7	12 2.8	17 5.9	7 1.4	13 3.9	17R 6.1	
Mean	2.57	2.55	2.61	2.51	2.58	2.47	2.62	2.54	2.52	2.54	2.69	2.47	2.62	2.41	2.59	2.63	2.71	2.57	2.55	2.81	
Standard Deviation	1.54	1.54	1.51	1.58	1.57	1.52	1.57	1.55	1.53	1.56	1.53	1.52	1.55	1.45	1.58	1.53	1.59	1.51	1.58	1.59	
Standard Error	0.05	0.04	0.09	0.10	0.10	0.10	0.10	0.10	0.10	0.09	0.08	0.07	0.17	0.09	0.08	0.09	0.11	0.09	0.11	0.11	

(sig=.05) (n\_k) columns tested CDEFGHI, JKLM, NOPQ, RST

Hispanic MARKET CONNECTIONS, Inc. - Entel Telephone Service Hispanic Study - January 1997

# What do people think about having to dial a 5-digit long distance access code



Source: Hispanic Market Connections, Inc., March 1997

TABLE 061

10E. How likely would you be to dial a 5-digit access code to take advantage of lower rates offered by a long distance company other than the one you currently subscribe to?

	WEIGHTED																				
	MARKET (UNWEIGHTED)										LANGUAGE SEGMENTS				AGE				YEARS IN THE US		
	TOTAL WGHTD	TOTAL UNWGHTD	<=====							<=====				<=====				<=====			
			LA	NY	MIA	SF	CHI	SA	HOU	SPAN DOMT	SPAN PREF	BILING	ENGL PR/DM	18-29	30-39	40-54	55+	0-10	11-20	21+	
TOTAL	1801	1800	300	250	250	250	250	250	250	474	529	652	146	438	629	434	280	460	345	286	
	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	
	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	
			(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)	(T)	
No Answer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Any Response	1801	1800	300	250	250	250	250	250	250	474	529	652	146	438	629	434	280	460	345	286	
	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	
(NET) Top 2 Box	906	898	147	136	131	130	128	114	112	208	290J	350J	59	241q	338q	198	118	260T	177	126	
-----	50.3	49.9	49.0	54.4	52.4	52.0	51.2	45.6	44.8	43.8	54.8	53.7	40.2	55.0	53.8	45.6	42.0	56.5	51.2	44.0	
(4) Very Likely	330	318	57	49	42	41	43	46	40	70	92	142	26	75	125	81	40	90	59	41	
	18.3	17.7	19.0	19.6	16.8	16.4	17.2	18.4	16.0	14.8	17.4	21.8	17.8	17.2	19.9	18.7	14.4	19.5	17.0	14.5	
(3) Somewhat Likely	576	580	90	87	89	89	85	68	72	137	198M	208	33	166PQ	213	117	77	170	118	85	
	32.0	32.2	30.0	34.8	35.6	35.6	34.0	27.2	28.8	29.0	37.4	31.9	22.5	37.8	33.8	27.0	27.6	37.0	34.2	29.5	
(2) Not Very Likely	287	280	58	27	29	43	30	46	47	75	78	90	44JKL	87	94	67	34	67	52	38	
	15.9	15.6	19.3	10.8	11.6	17.2	12.0	18.4	18.8	15.8	14.8	13.8	30.1	20.0	15.0	15.5	12.2	14.5	15.1	13.3	
(1) Not Likely At All	484	505	75	66	66	68	79	76	75	131	129	185	39	89	169	139N	84N	107	91	87	
	26.8	28.1	25.0	26.4	26.4	27.2	31.6	30.4	30.0	27.6	24.3	28.4	26.7	20.4	26.9	32.0	29.9	23.3	26.2	30.2	
(NET) Bottom 2 Box	770	785	133	93	95	111	109	122	122	206	207	275	83K	177	263	206	118	174	143	125	
-----	42.8	43.6	44.3	37.2	38.0	44.4	43.6	48.8	48.8	43.4	39.1	42.2	56.8	40.4	41.9	47.5	42.1	37.8	41.4	43.5	
Don't know	124	117	20	21	24	9	13	14	16	60KLM	32	27	4	20	28	30	45NOP	26	26	36R	
	6.9	6.5	6.7	8.4	9.6	3.6	5.2	5.6	6.4	12.8	6.1	4.2	3.0	4.6	4.4	6.9	15.9	5.6	7.4	12.5	
Mean	2.45	2.42	2.46	2.52	2.47	2.43	2.39	2.36	2.33	2.36	2.51	2.49	2.32	2.54	2.49	2.35	2.32	2.56	2.45	2.32	
Standard Deviation	.10	1.11	1.09	1.12	1.10	1.07	1.13	1.13	1.10	1.10	1.07	1.14	1.07	1.02	1.11	1.15	1.13	1.08	1.09	1.12	
Standard Error	.03	0.03	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.06	0.05	0.12	0.06	0.06	0.07	0.08	0.06	0.07	0.08	

(sig=.05) (n\_k) columns tested CDEFGHI, JKLM, NOPQ, RST

Hispanic MARKET CONNECTIONS, Inc. - Entel Telephone Service Hispanic Study - January 1997

# How willing are people to dial a 5-digit long distance access code

